

REMARKS

Applicants have carefully reviewed and considered the current Office Action and the reference(s) cited therein. Claims 2, 4, 11, 16, 17, 19, 52, and 53 are herein amended; Claim 18 is herein canceled; and no claims are herein added. As a result, Claims 1-5, 7, 9-17, 19, 21-24, 47, 49-53, 55, 59, 64, and 66 are now pending in this application.

Most the claims amended herein have been amended to correct typographic errors or to make stylistic changes that should not affect the scope of the claims. However, Claim 17 has been amended to depend from Claim 7 instead of Claim 1.

Rejection of Claims 1-5, 7-19, 21-24, 47, 49-53, 55, 59, 64, and 66 under 35 U.S.C. §103

The Examiner has rejected Claims 1-5, 7-19, 21-24, 47, 49-53, 55, 59, 60, 64, and 66 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,023,507 issued to Wookey ("Wookey"). Claim 18 is herein canceled. Applicants respectfully traverse this rejection with respect to the remaining claims.

It appears to Applicants that the Examiner may not be fully aware of or may not fully appreciate the significance of at least one difference between the present invention, as claimed, and Wookey. In support of the current rejection, the Examiner states the following:

With regards to claims 1, 19, 47, and 53, Wookey does not expressly disclose the limitation that the request to establish a communications session includes user authentication information needed to establish the communications session. However, columns 9 and 10 discuss the security features of the disclosure, which prevent the service center from accessing the monitored systems for reasons unrelated to its primary purpose.

Examples given include a secure dial-back modem, having only a single point of access to a subnet, or a login/password system. It would have been obvious to one skilled in the art at the time of the invention that the required authentication information of a login/password system would not necessarily be known by a remote administrator at the service center. Thus, the information would have to be sent at some point before the connection is established. Because the connection establishment is, in fact, the second step of the process as described, it would have been obvious at the time of the invention that any required authentication information would have to be communicated during the first step, in which the request is made.

Applicants agree with the Examiner's observation that Wookey does not expressly disclose the limitation in Claims 1 and 47 that the request to establish a communications session includes user authentication information needed to establish the communications session. Moreover, Applicants contend that the Examiner's explanation of how Wookey would make this limitation obvious is at least inadequate if not improper. It should be noted that the Examiner is not arguing that it would have been obvious at the time of invention for a person of ordinary skill in the art ("PHOSITA") to combine elements known in the prior art, but instead, the Examiner is using an obviousness argument to create a limitation that the prior art does not teach, suggest, or provide a motivation for. Although the Supreme Court in *KSR International Co. v. Teleflex Inc.* determined that the "teaching, suggestion or motivation" test ("TSM") could not be applied rigidly, the Court reiterated that TSM was still a helpful tool in an obviousness analysis.

The present limitation of receiving a request requires that user authentication information be included in the request and requires that the request be received from a data storage system

(i.e., not from a user logging into the computer system). As explained on page 9, lines 5-10, of the present specification, when the computer system receives a request (e.g., in the form of a service ticket) from a data system, the process of receiving the request is automated. The Examiner is correct in stating that the information would have to be sent at some point before the connection is established. However, there is nothing in the prior art that teaches, suggests to, or motivates a PHOSITA to have the authentication information put into the request from the data storage system. Wookey focuses on having the computer system initiate access to the monitored system according to a scheduler maintained in the service center. As indicated by the Examiner in the current Office Action, Wookey indicates at Column 4, lines 11-16 that the data storage system (i.e., a monitored system) can initiate access. However, this statement of Wookey gives no indication that the initiation of access may be initiated by the data storage system in the form of a request that includes user authentication information.

This difference (i.e., the inclusion of the authentication information) is a significant one. This difference provides for a number of benefits of the invention as a whole that are not taught, suggested, or motivated by Wookey. First, it allows the request and, therefore, the communications session to be automated as explained above. That is, the user of the computer system does not need to enter the authentication information.

Second, it places the control of security with the data storage system rather than the computer system. Providing the authentication information in the request removes the need for the information to be stored on the computer system as taught in Wookey at Column 9, lines 5-10. Storing the authentication information on the computer system as taught by Wookey creates a

security risk that the present invention can eliminate. In this manner, Column 9, lines 5-10 of Wookey teaches away from the present invention.

Third, The present invention allows the data storage system to provide the computer system with different authentication information, such as a different username and password, in each different request. In addition to enhanced security created by frequently changing the authentication information, this benefit also allows the data storage system to customize the access to the data storage system. The data storage system may customize access in that different authentication information may provide the computer system with access to different communication devices. For example, the data storage system may provide the computer system with a first username/password pair to give the computer system access to a first router and, in a different request, the data storage system may provide a second username/password pair to the computer system to give the computer system access to a second router. Additionally, the data storage system may provide different authentication information to provide access to different subsystems of the data storage system. For example, the data storage system may provide a first username/password pair to the computer system to give the computer system access to a first subsystem of the data storage system and, in a different request, the data storage system may provide a second username/password pair to the computer system to give the computer system access to a second subsystem of the data storage system. In this manner, the data storage system can provide the computer system with access only to that subsystem of the data storage system that needs servicing.

The discussion above applies to the other independent claims (i.e., Claims 19 and 53) by analogy. That is, the discussion also applies to the process of sending a request from a data storage system that includes the authentication information. Thus, the present invention as claimed provides at least one limitation not taught, suggested, or motivated by the prior art that provides for significant benefits not taught, suggested, or motivated by the prior art. Applicants contend that the present invention, taken as a whole, would not have been obvious to a PHOSITA at the time of the invention.

Conclusion

Applicants respectfully submit that the claims are in condition for allowance and notification to that effect is earnestly requested. If the Examiner believes that a telephone conversation with the Applicants' representative would facilitate prosecution of this application in any way, the Examiner is cordially invited to telephone the undersigned at (508) 616-9660.

Respectfully submitted,

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